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Subject:Hoover v. Qualilty Loan Service Corporation of Washington et 20-04002-MJH Supplemental Transmittal of Record on Appeal

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U.S. Bankruptcy Court Western District of Washington

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The following transaction was received from Manley, Sherri entered on 4/1/2021 at 4:16 PM PDT and filed on 4/1/2021 Case Name: Hoover v. Quality Loan Service Corporation of Washington et

Docket Text: Supplemental Transmittal of Record on Appeal - Statement of Issues on Appeal and Notice of Ordering of Transcript on Appeal. BK Internal Appeal Number 21-T003 (Related document(s)[89], [113], [115], [116]) (SLM)

20-04002-MJH Notice will be electronically mailed to:

Jason D Anderson on behalf of Plaintiff Sarah Hoover jason@alkc.net

Emilie K Edling on behalf of Defendant HSBC Bank USA, NA

 $Christina\ L\ Henry\ on\ behalf\ of\ Plaintiff\ Sarah\ Hoover\\ chenry\ @hdm-legal.com; jgotnotices\ @henrydegraaff PS\ @jubileebk.net; mainline\ @hdm-legal.com; jgotnotices\ @henrydegraaff.com\\ legal.com; jgotnotices\ @henrydegraaff.com\\ le$

John Anthony McIntosh on behalf of Defendant IH6 Property Washington LP

Joseph W McIntosh on behalf of Defendant Quality Loan Service Corporation of Washington jmcintosh@McCarthyHolthus.com, wbabst@mccarthyholthus.com

 $Robert\ W\ Norman\ on\ behalf\ of\ Defendant\ HSBC\ Bank\ USA,\ NA\\ rnorman@houser-law.com,\ rperez@houser-law.com$

20-04002-MJH Notice will not be electronically mailed to:

4/1/2021, 4:18 PM 1 of 1

THE HONORABLE MARY JO HESTON Chapter 13

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11 SARAH HOOVER,

In re

Debtor.

Plaintiff,

CORPORATION OF WASHINGTON.

MORTGAGE INVESTMENT TRUST.

SERIES 2006-2, NEWREZ, LLC, AND IH6 PROPERTY WASHINGTON, L.P.

Defendants.

PHH MORTGAGE CORPORATION D/B/A PHH MORTGAGE SERVICES,

QUALITY LOAN SERVICE

HSBC BANK USA, N.A., AS TRUSTEE OF THE FIELDSTONE

D/B/A INVITATION HOMES

SARAH HOOVER,

VS.

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Page 1

APPELLANTS' STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL FROM MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER DENYING MOTION FOR RECONSIDERATION (DOC. 99) AP No. 20-04002-MJH

Chapter 13

UNITED STATES BANKRUPTCY COURT

WESTERN DISTRICT OF WASHINGTON AT TACOMA

Case No.: 19-42890-MJH

Adversary No.: 20-04002-MJH

APPELLANTS' STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL FROM MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER DENYING MOTION FOR RECONSIDERATION (DOC. 99)

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Defendants-Appellants PHH Mortgage Corporation D/B/A PHH Mortgage Services; NewRez, LLC; and HSBC Bank USA, N.A., as Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2 (collectively, "Defendants"), pursuant to Federal Rule of Bankruptcy Procedure 8009, submits its (i) statement of issues ("Statement of Issues") to be presented on its appeal of the Memorandum Decision on Cross-Motions for Summary Judgment (Doc. 81); Order on Cross-Motions for Summary Judgment (Doc. 82); and Order Denying Motion for Reconsideration (Doc. 99) in the above-captioned case, and (ii) designation of items in the record ("Designation of Record") to be included in the record on its appeal of both orders.

I. STATEMENT OF ISSUES

Defendants present the following issues on appeal:

- Whether the Bankruptcy Court erred in granting Plaintiff's Motion for Partial Summary Judgment against the Defendants and in denying the Defendants' Motion for Summary Judgment on the issue of whether Defendants violated the automatic bankruptcy stay and/or whether the Sale was void under the bankruptcy stay, given Defendants established that Plaintiff's interest in the Property was not protected under the automatic stay because she was not in title to the Property, she was not obliged on the Loan and there was therefore no debtor-creditor relationship, she was not a confirmed "successor in interest" in the Defendants' records due to her own failure to complete the necessary documents to be so designated, Defendants did not have adequate notice or knowledge of Plaintiff's bankruptcy or her interest in the Property, the Property was held in a spendthrift trust that excluded it from being property of the estate under § 541(c)(2), and Plaintiff provided no evidence of any damages resulting from any alleged violation of the stay.
- 2. Whether the Bankruptcy Court erred in denying Defendants' Motion to Annul the Automatic Stay based on the Court's balancing of the equities, which failed to

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appropriately weigh the fact that Plaintiff obtained a benefit by living at the Property;
Plaintiff filed for Bankruptcy for the sole purpose of stopping the sale of Property she knew
secured a Loan that had been in long-term default and which she could not reinstate; Plaintiff
delayed four months before filing for bankruptcy and notifying Defendants the day before
the sale of her bankruptcy; and Plaintiff engaged in other inequitable conduct, and then
sought damages and punitive damages in her claim against Defendants.

- 3. Whether the Bankruptcy Court erred in granting Plaintiff's Motion for Partial Summary Judgment against Defendants and in denying the Defendants' Motion for Summary Judgment with regard to whether Defendants engaged in a willful violation of the automatic stay, and also erred in ruling PHH acted with a "complete disregard" for Plaintiff's rights," because there was no evidence that Defendants had knowledge that Plaintiff was in title to the Property (given that she wasn't), nor that Defendants had knowledge that Plaintiff was obliged under the contractual terms of the Loan (given that she wasn't), nor did Defendants have any basis for believing Plaintiff had an interest in the Property that was protected by the automatic stay, among other reasons.
- 4. Whether the Bankruptcy Court erred in denying Defendants' Motion for Reconsideration, in light of the information Defendants provided in the motion concerning the Court's ruling on whether Defendants "willfully" violated the automatic bankruptcy stay and/or showed a "complete disregard" for Plaintiff's rights; whether the balancing of equities weighed in favor of denying Defendants' Motion to Annul; and whether Plaintiff's claim for violation of the automatic stay could survive summary judgment when Plaintiff failed to provide evidence of damages.

II. DESIGNATION OF THE RECORD

Appellants designate the following items to be included in the record on its appeal.

To the extent exhibits are attached to or referred to in any of the items identified below, they

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shall be included in the Designation of Record. In addition, Appellants hereby designate in the record on appeal the transcripts of the court hearings as further identified below and in Appellant's *Notification of Ordering Transcript on Appeal* ("Transcript Notification"). The Transcript Notification is being filed with the Court simultaneously with this Statement of Issues.

6	Docket #	Date Filed	Description of Document/Date Entered
7	Adversary		
8	Action No. 20- 04002-MJH		
9	unless otherwise stated		
10			Adversary case 20-04002. Complaint by Sarah Hoover
11			(attorneys Christina L Henry, Jason D Anderson, Christina L Henry) against Quality Loan Services of
12			Washington (attorneys Robert William McDonald,
		01/05/2020	Lance Olsen), PHH Mortgage Corporation, New Rez,
13	1	01/25/2020	LLC, HSBC Bank USA NA, IH6 Property Washington, LP (attorneys John A. McIntosh, Thomas S Linde).
14			(Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C
15			# 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G
16			# 8 Exhibit H) Nature of Suit: (14 (Recovery of money/property - other)) (Henry, Christina) (Entered:
			01/25/2020)
17			Amend Complaint. Defendant not added. Defendants
18			not added. Amending: Amended to correct name of defendant PHH Mortgage Corporation d/b/a PHH
19			Mortgage Services and to update addresses of
	7	02/04/2020	defendants (Related document(s)1 Complaint) Filed
20	,	02/04/2020	by Christina L Henry of Henry & Degraaff, P.S. on
21			behalf of Sarah Hoover. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E #
22			6 Exhibit F # 7 Exhibit G # 8 Exhibit H) (Henry,
23			Christina) (Entered: 02/04/2020)
			Motion for Summary Judgment with Notice of Hearing.
24	13	02/24/2020	Filed by Joseph W McIntosh on behalf of Quality Loan
25			Service Corporation of Washington The Hearing date is

APPELLANTS' STATEMENT OF ISSUES AND
DESIGNATION OF RECORD ON APPEAL FROM
MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR
SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER
DENYING MOTION FOR RECONSIDERATION (DOC. 99)
AP No. 20-04002-MJH
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1 2			set for 3/24/2020 at 01:00 PM at Judge Heston's Courtroom H, Union Station. Response due by 3/17/2020. (McIntosh, Joseph) (Entered: 02/24/2020)
			_
3 4 5 6	14	02/25/2020	Answer to Complaint (Related document(s)7 Amend Complaint). Filed by Joseph W McIntosh of McCarthy & Holthus, LLP on behalf of Quality Loan Service Corporation of Washington. (McIntosh, Joseph) (Entered: 02/25/2020)
7 8 9	15	02/25/2020	Stipulated Statement Deposit of Surplus Funds Filed by Joseph W McIntosh of McCarthy & Holthus, LLP on behalf of Quality Loan Service Corporation of Washington. (McIntosh, Joseph) (Entered: 02/25/2020)
10 11 12	17	02/28/2020	Answer to Complaint (Related document(s)7 Amend Complaint). Filed by John Anthony McIntosh of Schweet Linde & Coulson on behalf of IH6 Property Washington LP. (McIntosh, John) (Entered: 02/28/2020)
13 14 15 16	18	03/03/2020	ORDER Consolidating Actions and Setting Status Conference. The Status Conference is set for 3/13/2020 at 09:00 AM at Judge Heston's Courtroom H, Union Station, 1717 Pacific Ave, Courtroom H, Tacoma, WA. (SLM) (Entered: 03/03/2020)
17 18 19 20	22	03/11/2020	Amended Answer to Complaint (Related document(s)7 Amend Complaint). Filed by Ryan S Moore on behalf of HSBC Bank USA, NA, NewRez, LLC, PHH Mortgage Corporation. (Moore, Ryan) (Entered: 03/11/2020)
21 22 23	26	03/17/2020	Declaration of Christina L Henry (Related document(s)13 Motion for Summary Judgment) Filed by Christina L Henry of Henry & Degraaff, P.S. on behalf of Sarah Hoover. (Henry, Christina) (Entered: 03/17/2020)
24 25	28	03/17/2020	Response to Motion for Summary Judgment and Dismissal ny Defendant Quality Loan Service Coro of Washington (Related document(s)13 Motion for

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1			Summary Judgment) Filed by Christina L Henry of Henry & Degraaff, P.S. on behalf of Sarah Hoover.
2			(Attachments: # 1 Proposed Order) (Henry, Christina) (Entered: 03/17/2020)
3			Reply (Related document(s)13 Motion for Summary
4			Judgment) Filed by Joseph W McIntosh of McCarthy
	29	03/19/2020	& Holthus, LLP on behalf of Quality Loan Service
5			Corporation of Washington. (McIntosh, Joseph) (Entered: 03/19/2020)
6			ORDER Directing Deposit of Surplus Funds to be
7			Placed in a Non-Interest- Bearing Account in Court
	40	05/18/2020	Registry Re: Stipulation for Deposit of Surplus Funds
8			Into the Court Registry Pending Further Court Order (ECF NO. 15). (Related document(s)15). (TGR)
9			(Entered: 05/18/2020)
10	41	05/20/2020	BNC Certificate of Notice (Related document(s)40
	41	03/20/2020	Order GENERIC). Notice Date 05/20/2020. (Admin.)
11			(Entered: 05/20/2020)
12			Plaintiff's Motion for Summary Judgment (Partial) with Notice of Hearing. Filed by Christina L Henry on behalf
13	42	08/06/2020	of Sarah Hoover The Hearing date is set for 9/3/2020 at
13			09:00 AM at Judge Heston's Courtroom H, Union
14			Station. Response due by 8/27/2020. (Henry, Christina)
15			(Entered: 08/06/2020) Declaration of Sara Hoover in Support of Motion for
1.6			Partial Summary Judgment (Related document(s)42
16	43	08/07/2020	Motion for Summary Judgment) Filed by Christina L
17	73	06/07/2020	Henry of Henry & Degraaff, P.S. on behalf of Sarah
18			Hoover. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7
			Exhibit 7) (Henry, Christina) (Entered: 08/07/2020)
19			Declaration of Christina L Henry in Support of Partial
20			Motion to Dismiss (Related document(s)42 Motion for
21	44	08/07/2020	Summary Judgment) Filed by Christina L Henry of Henry & Degraaff, P.S. on behalf of Sarah Hoover.
	44	00/07/2020	(Attachments: # 1 Exhibit A # 2 Exhibit B - part 1 # 3
22			Exhibit B - part 2 # 4 Exhibit C # 5 Exhibit D # 6
23			Exhibit E # 7 Exhibit F) (Henry, Christina) (Entered:
24	45	08/07/2020	08/07/2020) Notice of Hearing on Plaintiff's Motion for Partial
	43	00/07/2020	Summary Judgment (Related document(s)42 Motion for
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1 2			Summary Judgment). Filed by Christina L Henry on behalf of Sarah Hoover. (Henry, Christina) (Entered: 08/07/2020)
3	46	08/07/2020	Supplemental Filing of Proposed Order. Filed by Christina L Henry on behalf of Sarah Hoover. (Related
4			document(s)42 Motion for Summary Judgment). (Henry, Christina) (Entered: 08/07/2020)
5			Supplemental Declaration of Christina L Henry in Support of Partial Motion for Summary Judgment
6	50	08/10/2020	(Related document(s)42 Motion for Summary Judgment) Filed by Christina L Henry of Henry &
7			Degraaff, P.S. on behalf of Sarah Hoover. (Attachments: # 1 Exhibit G) (Henry, Christina) (Entered: 08/10/2020)
8	56	08/19/2020	Stipulated Protective ORDER (Related document(s)54).
10			(Attachments: # 1) (CMK) (Entered: 08/19/2020) Motion for Summary Judgment Renewed (Dkts #13 and
11			#29) with Notice of Hearing. Filed by Joseph W McIntosh on behalf of Qualilty Loan Service
12	58	10/15/2020	Corporation of Washington The Hearing date is set for 11/20/2020 at 09:00 AM at Judge Heston's Courtroom
13			H, Union Station. Response due by 11/13/2020. (Attachments: # 1 Proposed Order) (McIntosh, Joseph)
14			Incorrect Hearing Date and Incomplete Call In Information. Modified on 10/15/2020 (TGR). (Entered:
15			10/15/2020) Defendant's Motion for Summary Judgment with Notice
16 17			of Hearing and Supplemental Declaration of Christina L Henry via suplemental doc 79. Filed by Ryan S Moore
18			on behalf of HSBC Bank USA, NA, NewRez, LLC,
19	62	10/16/2020	PHH Mortgage Corporation The Hearing date is set for 11/20/2020 at 09:00 AM at Telephonically. Response
20			due by 11/13/2020. (Attachments: # 1 Proposed Order Proposed Order) (Moore, Ryan) No Notice of Hearing
21			Included. Filer Notified. Modified on 10/19/2020 (TGR). Modified on 1/7/2021 (DAS) (Entered: 10/16/2020)
22 23			Declaration of Ryan S. Moore (Related document(s)62 Motion for Summary Judgment). Proof of Service. Filed
23	63	10/16/2020	by Ryan S Moore of Houser LLP on behalf of HSBC
25			Bank USA, NA, NewRez, LLC, PHH Mortgage Corporation. (Moore, Ryan) (Entered: 10/16/2020)
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1	64	10/16/2020	Declaration (Related document(s)62 Motion for Summary Judgment). Proof of Service. Filed by Ryan S
2			Moore of Houser LLP on behalf of HSBC Bank USA, NA, NewRez, LLC, PHH Mortgage Corporation.
3			(Moore, Ryan) (Entered: 10/16/2020)
4			Motion for Summary Judgment with Supplemental
			Declaration via Supplemental Doc 79 and Notice of Hearing. Filed by John Anthony McIntosh on behalf of
5			IH6 Property Washington LP The Hearing date is set for
6	65	10/16/2020	11/20/2020 at 09:00 AM at Judge Heston's Courtroom
7			H, Union Station. Response due by 11/13/2020.
8			(Attachments: # 1 Proposed Order) (McIntosh, John). Related document(s) 79 Declaration filed by Plaintiff
			Sarah Hoover. Modified on 1/7/2021 (DAS). (Entered:
9			10/16/2020)
10			Response to Plaintiff's Motion for Partial Summary Judgment (Related document(s)42 Motion for Summary
11	68	11/13/2020	Judgment). Proof of Service. Filed by Robert W
			Norman on behalf of HSBC Bank USA, NA, NewRez,
12			LLC, PHH Mortgage Corporation. (Norman, Robert)
13			(Entered: 11/13/2020) Response to (Related document(s)42 Motion for
14	69	11/13/2020	Summary Judgment) Filed by John Anthony McIntosh
15	09	11/13/2020	of Schweet Linde & Coulson on behalf of IH6 Property
15			Washington LP. (Attachments: # 1 Pleading
16			Declaration) (McIntosh, John) (Entered: 11/13/2020) Plaintiff's Response to Plaintiffs Combined Opposition
17			To Motions for Summary Judgment by Defendants
18	70	11/12/2020	PHH Mortgage Corporation, HSBC Bank, and NewRez,
	72	11/13/2020	LLC, And IH6 Property (Related document(s)62 Motion for Summary Judgment, 65 Motion for
19			Summary Judgment) Filed by Christina L Henry of
20			Henry & Degraaff, P.S. on behalf of Sarah Hoover.
21			(Henry, Christina) (Entered: 11/13/2020)
			Declaration of Christina L Henry in Support of Plaintiffs Combined Opposition To Motions for
22	73	11/13/2020	Summary Judgment by Defendants PHH Mortgage
23	13	11/13/2020	Corporation, HSBC Bank, and NewRez, LLC, And IH6
24			Property (Related document(s)62 Motion for Summary Judgment, 65 Motion for Summary Judgment) Filed
25			by Christina L Henry of Henry & Degraaff, P.S. on
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			habalf of Carab Haavan (Attachments, # 1 Exhibit A #
1			behalf of Sarah Hoover. (Attachments: # 1 Exhibit A # 2 Prudent Exhibit 3 # 3 Prudent Exhibit 4 # 4 Prudent
			Exhibit 6 # 5 Prudent Exhibit 10 # 6 Prudent Exhibit 13
2			# 7 Prudent Exhibit 15 # 8 Prudent Exhibit 16 # 9
3			Exhibit B # 10 Exhibit C # 11 Exhibit D # 12 Exhibit E
			# 13 Exhibit F # 14 Exhibit G # 15 QLS Exhibit 1 # 16
4			Exhibit H # 17 IHG Exhibit 1 # 18 Exhibit I # 19
5			Exhibit J # 20 Exhibit K # 21 Exhibit L # 22 Stenman
3			Exhibit 3) (Henry, Christina) (Entered: 11/13/2020)
6			Reply (Related document(s)58 Motion for Summary
_	7.4	11/16/2020	Judgment) Filed by Joseph W McIntosh of McCarthy
7	74	11/16/2020	& Holthus, LLP on behalf of Qualilty Loan Service
8			Corporation of Washington. (McIntosh, Joseph)
			(Entered: 11/16/2020)
9			Reply to Plaintiff's Combined Opposition to Motions for
10			Summary Judgment (Related document(s)72 Response).
10	75	11/17/2020	Proof of Service. Filed by Robert W Norman on behalf
11			of HSBC Bank USA, NA, NewRez, LLC, PHH
			Mortgage Corporation. (Norman, Robert) (Entered:
12			11/17/2020)
13			Reply In Support of Plaintiffs Motion for Partial
	76	11/17/2020	Summary Judgment (Related document(s)42 Motion for
14	, 0	11/1//2020	Summary Judgment) Filed by Christina L Henry of
15			Henry & Degraaff, P.S. on behalf of Sarah Hoover.
13			(Henry, Christina) (Entered: 11/17/2020)
16			Reply (Related document(s)65 Motion for Summary
	77	11/17/2020	Judgment) Filed by John Anthony McIntosh of
17			Schweet Linde & Coulson on behalf of IH6 Property
18			Washington LP. (Attachments: # 1 Pleading
			Declaration) (McIntosh, John) (Entered: 11/17/2020) Supplemental Declaration of Christina L Henry in
19			Support of Opposition to Motions for Summary
20			Judgment by Defendants (Related document(s)73
20			Declaration 62Defendants Motion for Summary
21	79	01/07/2021	Judgment, 65 Motion For Summary Judgment) Filed
22			by Christina L Henry of Henry & Degraaff, P.S. on
22			behalf of Sarah Hoover. (Attachments: #1 Exhibit K)
23			(Henry, Christina). Related document(s) 62 filed by
			Defendant NewRez, LLC, Defendant PHH Mortgage
24			Corporation, Defendant HSBC Bank USA, NA, 65
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APPELLANTS' STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL FROM MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER DENYING MOTION FOR RECONSIDERATION (DOC. 99) AP No. 20-04002-MJH Page 9

1			Motion for Summary Judgment filed by Defendant IH6 Property Washington LP. (Entered: 01/07/2021)
2			Statement Praecipe to Plaintiff's Combined Opposition
3			to Motions For Summary Judgment By Defendants
3	80	01/07/2021	PHH Mortgage Corporation, HSBC Bank, and NewRez, LLC, and IH6 Property (Related document(s)62 Motion
4		01/07/2021	for Summary Judgment, 65 Motion for Summary
5			Judgment) Filed by Christina L Henry of Henry &
6			Degraaff, P.S. on behalf of Sarah Hoover. (Henry, Christina) (Entered: 01/07/2021)
	0.1	02/00/2021	Memorandum Decision on Cross- Motions for
7	81	02/08/2021	Summary Judgment. (Related document(s)58, 62, 65).
8			(TGR) (Entered: 02/08/2021)
9	82	02/08/2021	ORDER on Cross- Motions for Summary Judgment. (Related document(s)42, 58, 62, 65). (TGR) (Entered:
10			02/08/2021)
	0.6	02/10/2021	ORDER Granting Motion to Extend Deadlines for
11	86	02/19/2021	Filing Motion for Reconsideration, Notice of Appeal, and Motion for Leave to Appeal. (Related
12			document(s)82) (SLM) (Entered: 02/19/2021)
13			Motion to Reconsider. Filed by Emilie K Edling on
14			behalf of HSBC Bank USA, NA, IH6 Property Washington LP, NewRez, LLC, PHH Mortgage
	88	02/26/2021	Corporation. (Related document(s) 92 Amended Motion
15			to Reconsider, 94 Amended Motion to Reconsider)
16			(Edling, Emilie) Modified on 3/3/2021. (SLM). Modified on 3/8/2021 (TGR). (Entered: 02/26/2021)
17			Notice of Appeal and Statement of Election to District
18			Court. USDC Case No 21-5154-BHS; Internal Appeal
	89	02/26/2021	No 21-T003. Fee Due \$ 298. Filed by Emilie K Edling on behalf of HSBC Bank USA, NA, NewRez, LLC,
19	09	02/20/2021	PHH Mortgage Corporation. Record Transmission due
20			by 03/26/2021. (Related document(s) 81, 82) (Edling,
21			Emilie) Modified on 3/3/2021. (SLM) (Entered:
			02/26/2021) Amended Motion to Reconsider Filed by Emilie K
22	94	03/05/2021	Edling on behalf of HSBC Bank USA, NA, NewRez,
23			LLC, PHH Mortgage Corporation (Edling, Emilie)
24	95	03/15/2021	(Entered: 03/05/2021) Motion for Stay Pending Appeal; Memorandum of
25		55, 15, 2021	Points and Authorities in Support Thereof # 3:21-cv-
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1			05154-BHS. Filed by Emilie K Edling on behalf of
			HSBC Bank USA, NA, NewRez, LLC, PHH Mortgage Corporation. The Hearing date is set for 4/8/2021 at
2			01:00 PM at Telephonically. (Attachments: # 1
3			Proposed Order Proposed Order)(Edling, Emilie)
4			(Entered: 03/15/2021)
4			Supplemental Memorandum of Points and Authorities
5			in Support of Motion to Stay (Related document(s)95
	97	03/18/2021	Motion for Stay Pending Appeal). Proof of Service.
6			Filed by Emilie K Edling on behalf of HSBC Bank
7			USA, NA, NewRez, LLC, PHH Mortgage Corporation.
	00	02/10/2021	(Edling, Emilie) (Entered: 03/18/2021)
8	99	03/19/2021	ORDER Denying Motion for Reconsideration. (Related Doc # 94). (TGR) (Entered: 03/19/2021)
9			Plaintiff's Response to Motion for Stay Pending Appeal
			(Related document(s)95 Motion for Stay Pending
10	101	03/22/2021	Appeal) Filed by Christina L Henry of Henry &
11			Degraaff, P.S. on behalf of Sarah Hoover. (Henry,
			Christina) (Entered: 03/22/2021)
12			Declaration of Sarah Hoover in Support of Opposition
13	102	03/22/2021	to Stay Pending Appeal (Related document(s)95 Motion
	102	05/22/2021	for Stay Pending Appeal) Filed by Christina L Henry
14			of Henry & Degraaff, P.S. on behalf of Sarah Hoover.
15			(Henry, Christina) (Entered: 03/22/2021)
			Declaration of Christina L Henry in Support of Opposition to Stay Pending Appeal (Related
16			document(s)95 Motion for Stay Pending Appeal)
17	102	02/22/2021	Filed by Christina L Henry of Henry & Degraaff, P.S.
	103	03/22/2021	on behalf of Sarah Hoover. (Attachments: # 1 Exhibit A
18			# 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E
19			# 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I #
			10 Exhibit J # 11 Exhibit K # 12 Exhibit L) (Henry,
20			Christina) (Entered: 03/22/2021)
21			Reply in Support of Motion to Stay and Discovery
			Issues (Related document(s)95 Motion for Stay Pending Appeal). Proof of Service. Filed by Emilie K Edling on
22	107	03/25/2021	behalf of HSBC Bank USA, NA, NewRez, LLC, PHH
23			Mortgage Corporation. (Attachments: # 1 Declaration of
			Emilie K. Edling in Support) (Edling, Emilie) (Entered:
24			03/25/2021)
			

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APPELLANTS' STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL FROM MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER DENYING MOTION FOR RECONSIDERATION (DOC. 99) AP No. 20-04002-MJH Page 11

ll ll			
1 2	110	03/30/2021	ORDER Denying Motion to Stay Proceedings Pending Appeal and Ordering Other Relief. Status Conference set for 4/20/21 at 2:30 PM Telephonically. (Related Doc # 95). (TGR) (Entered: 03/30/2021)
3 4 5 6 7	113	03/30/2021	Notice of Appeal and Statement of Election to District Court (AMENDED) Fee Due \$ 298(AMENDED) (Related document(s)82 Order GENERIC, 99 Order Re Motion to Reconsider). Filed by Emilie K Edling on behalf of HSBC Bank USA, NA, NewRez, LLC, PHH Mortgage Corporation. Record Transmission due by 04/27/2021, (Edling, Emilie) (Entered: 03/30/2021)
7 8	3/31/2021	Not yet docketed	Statement of Issues and Designation of Record
9	N/A	N/A	Docket for Adversary Action No. 20-04002-MJH, showing all minute entries without docket numbers and other entries
10 11 12 13 14 15	Bankruptcy Petition #19- 42890-MJH	09/09/2019	Chapter 13 Voluntary Petition, Individual, . Statement of Financial Affairs due 9/24/2019. Schedules A-J due 9/24/2019. Summary of schedules due 9/24/2019. Chapter 13 Statement of Current Monthly Income and Calculation of Commitment Period, Form 122C-1 Due 9/24/2019 Chapter 13 Plan due 9/24/2019. Incomplete Filings due by 9/24/2019. Filed by Sarah Hoover (PSB) Additional attachment(s) added on 9/9/2019 (MT). (Entered: 09/09/2019)
16 17 18	Bankruptcy Petition #19- 42890-MJH	09/09/2019	Application to Pay Filing Fees in Installments Filed by Sarah Hoover (MT) (Entered: 09/09/2019)
19 20 21 22	Bankruptcy Petition #19- 42890-MJH	09/09/2019	Notice of Order Approving Filing Fee Installment Payments, ORDER Granting Payment of Filing Fee in Installments: Entry of an order of discharge will be held in abeyance until filing fees are paid in full. Mark L. Hatcher, Clerk. Text only order . Final Installment Payment due by 1/7/2020. (MT) (Entered: 09/09/2019)
23 24 24 24 24 24 24 24	Bankruptcy Petition #19- 42890-MJH	09/09/2019	Notice of Deficient Filing . (MT) (Entered: 09/09/2019)
25	7		

1	Bankruptcy Petition #19-	00/10/2010	Debtor(s) Requirements to Send Documents to the
2	42890-MJH	09/10/2019	Trustee. Sent to BNC for Mailing. (admin) (Entered: 09/10/2019)
3	9		05/10/2017)
4			Pursuant to Local Bankruptcy Rule 1017-1(d) and Fed. R. Bankr. P. 3015(b), the Chapter 13 Trustee (as
5			designated by the United States Trustee) moves the Court ex parte for an order dismissing this case because
6	Bankruptcy Petition #19-	09/25/2019	Debtor failed to timely file schedules, statements, lists and/or a plan. The Debtor was given notice of this
7	42890-MJH	09/23/2019	deficiency, the deadline, and that the Chapter 13 Trustee
8	(Not numbered)		may file this ex parte motion if the debtor did not cure the deficiency. (Related document(s)7 Notice of
9			Deficient Filing). Filed by Michael G. Malaier on behalf of Michael G. Malaier. (Malaier, Michael) (Entered:
10			09/25/2019)
11			Ex Parte ORDER Dismissing Case for Inadequate Filing. This matter comes before the Court on the
12			Chapter 13 Trustee's Ex Parte Application for Order Dismissing Case for Failure to File Schedules,
13			Statements, Lists, or Plan. The debtor(s) having
14	Bankruptcy Petition #19-		received notice of dismissal for failure to timely file required schedules, statements, lists and/or plan, this
15	42890-MJH	09/26/2019	case is dismissed pursuant to Local Bankruptcy Rule 1017-1(d) and Fed. R. Bankr. P. 3015(b) for the
16	14		debtor(s)'s failure to timely file schedules, statements,
17			lists and/or chapter 13 plan.
18			Hereby ordered by Judge Mary Jo Heston.
19			This Notice of Electronic Filing is the Official ORDER
20	Bankruptcy		for this entry. (Entered: 09/26/2019)
21	Petition #19-	10/02/2019	Chapter 13 Trustee's Final Report and Account
22	42890-MJH		(Malaier, Michael) (Entered: 10/02/2019)
23	16		CLOSED. This was than has some hafare the Count in
24	Bankruptcy Petition #19- 42890-MJH	10/02/2019	CLOSED. This matter has come before the Court in conjunction with the Chapter 13 Trustee filing his Final Report and Accounting, a copy of which was provided
25	72070-WIJII		Report and Accounting, a copy of which was provided

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Page 13

1	(Not numbered)		to debtor and debtor's attorney. For purposes of this order, debtor refers to the above-named individual
$_{2}$	(1 vot nambered)		petitioner or joint petitioners. The Court finds that the
			debtor's case was dismissed pursuant to the Court's
3			Order. Now, therefore, it is hereby ORDERED that the
4			Final Account of the Trustee be and the same is hereby
_			approved; and it is further ORDERED that the standing
5			trustee be and hereby is discharged as Trustee; and it is
6			further ORDERED that this case be and hereby is closed
0			. (MT) (Entered: 10/02/2019) Motion to Reopen Chapter 13 Case Filed by John
7	Bankruptcy		Anthony McIntosh on behalf of IH6 Property
8	Petition #19-		Washington L.P. The Hearing date is set for 2/3/2020 at
0	42890-MJH	01/10/2020	01:00 PM at Judge Heston's Courtroom H, Union
9			Station. Response due by 1/27/2020. (Attachments: # 1
10	17		Proposed Order # 2 Notice of Hearing) (McIntosh,
10			John) (Entered: 01/10/2020)
11			Motion for Relief from Stay, Real Property located at
12	Bankruptcy		18205 106th Street East, Bonney Lake, WA Filed by
12	Petition #19-	01/10/2020	John Anthony McIntosh on behalf of IH6 Property
13	42890-MJH	01/10/2020	Washington L.P. The Hearing date is set for 2/3/2020 at 01:00 PM at Judge Heston's Courtroom H, Union
14			Station. Response due by 1/27/2020. (Attachments: # 1
14	18		Proposed Order # 2 Notice of Hearing) (McIntosh,
15			John) (Entered: 01/10/2020)
16	Doulementors		Declaration of Michael Lappano (Related
10	Bankruptcy Petition #19-		document(s)17 Motion to Reopen Chapter 13 Case, 18
17	42890-MJH	01/10/2020	Motion for Relief from Stay) Filed by John Anthony
18	42000 WIJII		McIntosh of Schweet Linde & Coulson on behalf of IH6
10	19		Property Washington L.P (McIntosh, John) (Entered:
19			01/10/2020) Deployetion of Leff Stammon (Beloted decomposition) 17
20	Bankruptcy		Declaration of Jeff Stenman (Related document(s)17 Motion to Reopen Chapter 13 Case, 18 Motion for
20	Petition #19-	01/10/2020	Relief from Stay) Filed by John Anthony McIntosh of
21	42890-MJH	01/10/2020	Schweet Linde & Coulson on behalf of IH6 Property
22	20		Washington L.P (McIntosh, John) (Entered:
22	20		01/10/2020)
23	Bankruptcy		Declaration John McIntosh (Related document(s)17
24	Petition #19-	01/10/2020	Motion to Reopen Chapter 13 Case, 18 Motion for
∠4 	42890-MJH		Relief from Stay) Filed by John Anthony McIntosh of
25			Schweet Linde & Coulson on behalf of IH6 Property

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1	21		Washington L.P (McIntosh, John) (Entered: 01/10/2020)
2	Bankruptcy		Proof of Service . Filed by John Anthony McIntosh on behalf of IH6 Property Washington L.P (Related
3	Petition #19- 42890-MJH	01/10/2020	document(s)17 Motion to Reopen Chapter 13 Case, 18
4	12070 141311		Motion for Relief from Stay, 19 Declaration, 20
5	22		Declaration, 21 Declaration). (McIntosh, John) (Entered: 01/10/2020)
6	Bankruptcy		Response to Motion to Annul the Automatic Stay
	Petition #19- 42890-MJH	01/27/2020	(Related document(s)18 Motion for Relief from Stay) Filed by Christina L Henry of Henry & Degraaff, P.S.
7			on behalf of Sarah Hoover. (Henry, Christina) (Entered:
8	24		01/27/2020)
9			Declaration of Sarah Hoover in Support of Response to Motion to Annul the Stay (Related document(s)18
10	Bankruptcy		Motion for Relief from Stay) Filed by Christina L
11	Petition #19-	01/27/2020	Henry of Henry & Degraaff, P.S. on behalf of Sarah Hoover. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3
12	42890-MJH		Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7
	25		Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L # 13 Exhibit M # 14
13			Exhibit N # 15 Exhibit O # 16 Exhibit P # 17 Exhibit Q)
14			(Henry, Christina) (Entered: 01/27/2020)
15	Bankruptcy		Declaration of Christina L Henry in Support of Response to Motion to Annul the Automatic Stay
16	Petition #19-	01/27/2020	(Related document(s)18 Motion for Relief from Stay)
	42890-MJH	01/21/2020	Filed by Christina L Henry of Henry & Degraaff, P.S.
17	26		on behalf of Sarah Hoover. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5)
18			(Henry, Christina) (Entered: 01/27/2020)
19	Bankruptcy		Reply in Support of Motion to Annul Automatic Stay (Related document(s)18 Motion for Relief from Stay).
20	Petition #19- 42890-MJH	01/29/2020	Proof of Service. Filed by John Anthony McIntosh of
21	42090-MJH		Schweet Linde & Coulson on behalf of IH6 Property
	28		Washington L.P (Attachments: # 1 Proof of Service) (McIntosh, John) (Entered: 01/29/2020)
22	Bankruptcy		Supplemental Declaration of Sarah Hoover in Support
23	Petition #19-	01/31/2020	of Response to Motion to Annul the Automatic Stay (Polated document(s) 18 Motion for Police from Stay)
24	42890-MJH		(Related document(s)18 Motion for Relief from Stay) Filed by Christina L Henry of Henry & Degraaff, P.S.
25	33		on behalf of Sarah Hoover. (Attachments: # 1 Exhibit 1

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II.			
1			- Trust Agreement # 2 Exhibit 2 - Amended One to Trust Agreement # 3 Exhibit 3 - Ali Suleiman Trust -
2			Amendment Two # 4 Exhibit 4 - Ali Suleiman Trust -
3			Amendment Three # 5 Exhibit 5 - Ali Suleiman Trust - Amendment Four # 6 Exhibit 6 - Affidavit of Trust
4			Existence and Authority signed on November 25, 2003 # 7 Exhibit 7 - ertificate and Affidavit of Trust
5			Existence signed on March 19, 2015 # 8 Exhibit 8 -
6			Codicil to the Last Will of Ali Suleiman) (Henry, Christina) (Entered: 01/31/2020)
7	Bankruptcy Petition #19-		ORDER REOPENED CASE. Granting Motion to
8	42890-MJH	02/14/2020	Reopen Chapter 13 Case. (Related Doc # 17) Review
9	37		Case on: 4/14/2020. (DAS) (Entered: 02/14/2020)
10	Bankruptcy Petition #19-		Supplemental Reply (Related document(s)18 Motion for
11	42890-MJH	02/17/2020	Relief from Stay) Filed by John Anthony McIntosh of Schweet Linde & Coulson on behalf of IH6 Property
12	38		Washington L.P (McIntosh, John) (Entered: 02/17/2020)
13			02/17/2020)
	Bankruptcy		Joinder in Support (Related document(s)18 Motion for
14	Petition #19-	02/20/2020	Relief from Stay). Proof of Service. Filed by Ryan S
15	42890-MJH		Moore on behalf of PHH Mortgage Corporation.
	40		(Moore, Ryan) (Entered: 02/20/2020)
16	Bankruptcy		
17	Petition #19-	2/20/2020	Declaration of Ryan S. Moore (Related document(s)40
	42890-MJH	2/20/2020	Joinder). Proof of Service. Filed by Ryan S Moore on behalf of PHH Mortgage Corporation. (Attachments: #
18			1 Exhibit A) (Moore, Ryan) (Entered: 02/20/2020)
19	41 Bankruptcy		
20	Petition #19-	03/03/2020	ORDER Consolidating Actions and Setting Status
21	42890-MJH	03/03/2020	Conference. (Related document(s)18, 23) (SLM) (Entered: 03/03/2020)
22	44		` '
		N/A	Docket for Bankruptcy Petition #19-42890-MJH,
23	N/A	1 1/ I I	showing all minute entries without docket numbers and
24			other entries
	I		

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APPELLANTS' STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL FROM MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER DENYING MOTION FOR RECONSIDERATION (DOC. 99) AP No. 20-04002-MJH Page 16

DATED: March 31, 2021 **HOUSER LLP** 1 By: <u>/s/ Emilie K. Edling</u> Emilie K. Edling WSBA No. 45042 2 eedling@houser-law.com 3 Robert W. Norman, Jr. WSBA No. 37094 rnorman@houser-law.com 4 Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., as Trustee of the Fieldstone Mortgage 5 Investment Trust, Series 2006-2, and 6 NewRez, LLC 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 APPELLANTS' STATEMENT OF ISSUES AND HOUSER LLP 26 DESIGNATION OF RECORD ON APPEAL FROM

AP No. 20-04002-MJH Page 17

MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR

SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER

DENYING MOTION FOR RECONSIDERATION (DOC. 99)

CERTIFICATE OF SERVICE

2	On March 31, 2021, I served th	e foregoing document(s): APPELLANTS'
3	STATEMENT OF ISSUES AND DESIGNA	ATION OF RECORD ON APPEAL FROM
4	MEMORANDUM AND ORDER ON CROSS	S-MOTIONS FOR SUMMARY JUDGMENT
5	(DOCS. 81 & 82) AND ORDER DENYING I	MOTION FOR RECONSIDERATION (DOC.
6	99), in the manner described below:	
7	Jason D. Anderson Anderson Santiago, PLLC	☑ CM/ECF □ UPS Overnight
8	787 Maynard Ave S., Suite B Seattle, WA 98104	☐ UPS 2 Day Shipping ☐ Email ☐ Courier
9	Jason@alkc.net	
10	Counsel for Plaintiff/Debtor	
11	Christina L. Henry Henry & Degraaff, P.S.	☑ CM/ECF □ UPS Overnight
12	787 Maynard Ave S., Suite B Seattle, WA 98104	☐ UPS 2 Day Shipping ☐ Email
13	chenry@hdm-legal.com	□ Courier
14	Counsel for Plaintiff/Debtor	
15	Joseph W. McIntosh McCarthy & Holthus, LLP	☑ CM/ECF □ UPS Overnight
16	108 1st Ave South, Suite 300	☐ UPS 2 Day Šhipping ☐ Email
17	Seattle, WA 98104 jmcintosh@mccarthyholthus.com	Courier
18	Counsel for Quality Loan Service Corporation of Washington	
19	Corporation of Washington	
20	John A. McIntosh Schweet Linde & Coulson, PLLC	☑ CM/ECF☐ UPS Overnight☐ UPS 2 Day Shipping
21	575 S. Michigan St. Seattle, WA 98108	☐ Email ☐ Courier
22	johnm@schweetlaw.com	- Country
23	Counsel for IH6 Property Washington, L.P.	
24		
25		

APPELLANTS' STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL FROM MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER DENYING MOTION FOR RECONSIDERATION (DOC. 99) AP No. 20-04002-MJH

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Page 18

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Dated: March 31, 2021

APPELLANTS' STATEMENT OF ISSUES AND
DESIGNATION OF RECORD ON APPEAL FROM
MEMORANDUM AND ORDER ON CROSS-MOTIONS FOR
SUMMARY JUDGMENT (DOCS. 81 & 82) AND ORDER
DENYING MOTION FOR RECONSIDERATION (DOC. 99)
AP No. 20-04002-MJH
Page 19

1		THE HONORABLE MARY JO HESTON Chapter 13
2		•
3		
4		
5		
6		
7	UNITED STATES BA	ANKRUPTCY COURT
8	WESTERN DISTRICT OF WASHINGTON AT TACOMA	
9		
10	In re	Chapter 13
11	SARAH HOOVER,	Case No.: 19-42890-MJH
12	Debtor.	Adversary No.: 20-04002-MJH
13	SARAH HOOVER,	NOTIFICATION OF ORDERING
14	Plaintiff,	OF TRANSCRIPT ON APPEAL
15	VS.	
16	QUALITY LOAN SERVICE	
17	CORPORATION OF WASHINGTON,	
18	PHH MORTGAGE CORPORATION D/B/A PHH MORTGAGE SERVICES,	
19	HSBC BANK USA, N.A., AS TRUSTEE OF THE FIELDSTONE	
20	MORTGAGE INVESTMENT TRUST, SERIES 2006-2, NEWREZ, LLC, AND	
21	IH6 PROPERTY WASHINGTON, L.P. D/B/A INVITATION HOMES	
22	Defendants.	
23	Defendants.	
24		
25	/	
26		

Case 20-04002-MJH Doc 116 Filed 03/31/21 Ent. 03/31/21 17:40:05 Pg. 1 of 3

HOUSER LLP

Seattle, WA 98101

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NOTIFICATION OF ORDERING OF TRANSCRIPT ON

APPEAL

Page 1

AP No. 20-04002-MJH

- 1					
1	A transcript of the electronically recorded proceedings was ordered on March 30,				
2	2021 for the hearing occurring on March 29, 2021, on Defendants' Motion to Stay				
3	Proceedings Pending Appeal.				
4	A transcript of the electronically recorded proceedings was ordered on March 31,				
5	2021 for the hearing occurring on November 20, 2020, on the Parties' Cross-Motions for				
6	Summary Judgment and Motion to Annul Stay.				
7	DATED: March 31, 2021 HOUSER LLP				
8	By: <u>/s/ Emilie K. Edling</u> Emilie K. Edling WSBA No. 45042				
9	eedling@houser-law.com				
10	Robert W. Norman, Jr. WSBA No. 37094 rnorman@houser-law.com				
11	Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., as				
12	Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2, and				
13	NewRez, LLC				
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NOTIFICATION OF ORDERING OF TRANSCRIPT ON APPEAL AP No. 20-04002-MJH Page 2

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Case 20-04002-MJH Doc 116 Filed 03/31/21 Ent. 03/31/21 17:40:05 Pg. 2 of 3

1	CERTIFICAT	E OF SERVICE			
2	On March 31, 2021, I served the	foregoing document(s): NOTIFICATION OF			
3	ORDERING OF TRANSCRIPT ON APPEAL, in the manner described below:				
4	Jason D. Anderson Anderson Santiago, PLLC	☑ CM/ECF □ UPS Overnight □ UPS 2 Day Shipping			
5	787 Maynard Ave S., Suite B Seattle, WA 98104	☐ Email ☐ Courier			
6	<u>Jason@alkc.net</u> Counsel for Plaintiff/Debtor	La courier			
7 8 9 10	Christina L. Henry Henry & Degraaff, P.S. 787 Maynard Ave S., Suite B Seattle, WA 98104 chenry@hdm-legal.com	☐ CM/ECF ☐ UPS Overnight ☐ UPS 2 Day Shipping ☐ Email ☐ Courier			
11	Counsel for Plaintiff/Debtor Joseph W. McIntosh	☑ CM/ECF			
12 13	McCarthy & Holthus, LLP 108 1st Ave South, Suite 300	☐ UPS Overnight ☐ UPS 2 Day Shipping ☐ Email			
14 15	Seattle, WA 98104 jmcintosh@mccarthyholthus.com Counsel for Quality Loan Service Corporation of Washington	☐ Courier			
16 17	John A. McIntosh Schweet Linde & Coulson, PLLC 575 S. Michigan St.	☑ CM/ECF □ UPS Overnight □ UPS 2 Day Shipping			
18	Seattle, WA 98108 johnm@schweetlaw.com	☐ Email ☐ Courier			
19	Counsel for IH6 Property Washington, L.P.				
20		the laws of the United States of America that the			
21	foregoing is true and correct.				
22	Dated: March 31, 2021				
23		Rachel M. Peres			
24		Rachel M. Perez			
25					

NOTIFICATION OF ORDERING OF TRANSCRIPT ON APPEAL AP No. 20-04002-MJH Page 3

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